

## **State and Federal Agency Coordination**

---



## **NEPA/404 Merger Process**



APR 19 2000 14:31 1000013430 1000013430 1000013430

April 19<sup>th</sup> NEPA Coordination Meeting Minutes  
District 4

U.S 34 Discussion

Paula Green gave a brief overview of the U.S. 34 project. She discussed the amount of existing ROW utilized and the amount of new ROW that will be required. Paula described and showed the areas where proposed U.S. 34 would diverge from the existing alignment. An overview of the environmental impacts was given.

Paula discussed removing this project from the NEPA process because an individual permit would not be required. The minimal wetland impacts would be considered isolated.

John Betker of the Rock Island COE questioned wetland number 40 & 41. He wanted to know if there was a perennial stream associated with them or were they isolated. John said there was no clear direction on how they are operating with the new isolated wetland ruling. He said they would determine this when a permit was submitted. It was mentioned that IDOT D4 would like to know before the permit was submitted.

John asked if there were any cultural impacts on the project. Paula explained that there would be some small areas that will require excavation, but they were insignificant and the digs were fact finding only.

USEPA questioned the use of a freeway or expressway around Monmouth. Paula explained that it has been an expressway for many years. She gave a brief description of the developed area near the existing expressway. She explained why it would not be feasible to make the bypass a freeway due to the number and proximity of businesses near the expressway.

Concurrence

Each agency was then asked if they concurred with the preferred alternative.

- Newton Ellens and Ken Westlake - U.S. EPA: concurred with the preferred alternative.
- Steve Hamer - IDNR: concurred with the preferred alternative
- John Betker - concurred with the preferred alternative, and stated that he had no problem with the project but if something comes up at a later time, we can revisit.
- Heidi Woeber - U.S. FWS concurred with the preferred alternative
- Terry Savko - IDOA concurred with the preferred alternative

A Final EIS is in preparation and will be submitted to IDOT and FHWA by mid-2002.

IL 29 Discussion

Paula Green gave a brief overview of the project. Paula discussed the difficulties of the project and all of the environmental resources that are and could be present.

The purpose for bringing this project to the meeting was to discuss the use of a new format for the EIS. A handout outlining the new format for the EIS was distributed and Paula discussed it.

John Betker asked if there was any legal constraint to doing it this way.

Kathy Ames explained the only difference would be the organization of the document. All of the required sections would be in it. She explained that Jeff Bruce has looked into the policy and finds nothing against this new format.

Kathy said that IL 29 would be used as a pilot project for the new EIS format. If it works out well then there would be policy change statewide.

John Betker said that he likes the flow of the new format. All the cooperating agencies agreed to the use of the new EIS format.

USEPA questioned the routes on the displays. Paula described the new bypass alternatives around Chillicothe, Spaulding, and Henry.

Mike Bruns explained the differences between this study and the previous one. He said the previous study was a regional one and that this study is simply a study of a northern route out of Peoria.

Paula asked the agencies if they felt a separate scoping meeting for this project would be needed. No definite answer was given from the agencies.

April 25, 2003 – Special Meeting with John Betker, USCOE  
NEPA/404 Merger Meeting Minutes  
IL 29 Study  
Peoria, Marshall Putnam and Bureau Counties  
P-94-009-01

**Concurrence Point: Purpose and Need and Alternatives to Carry Forward**

A list of those in attendance is attached:

The purpose of this meeting and the April 28, 2003 meeting with the other members of the nepa/404 Merger Team was to obtain concurrence on the Purpose and Need for the IL 29 Study.

Paula Green (IDOT) opened the meeting with an overview of Purpose & Need and then provided a more detailed description of the Purpose & Need. Following the presentation, there was a brief question and answer period. This discussion is summarized below.

John Betker, US Corps of Engineers, concurred with the Purpose & Need.

Dick Stafford (CH2M Hill) presented the alternative alignments that have been developed during the study. He described the impacts of these alignments and the reasons for some to be dropped from further study and others to be retained.

Mr. Betker didn't see any significant differences in the impacts of the alternative alignments shown in the southern section.

In the central section, there was particular discussion held regarding the railroad relocation to the east at Sparland. Charles Perino (IDOT) noted this relocation would be a longitudinal impact to the floodplain. It was asked if decurrent false aster was found near of Sparland. Ms. Green responded that yes, there is a newly found population which would be impacted.

In the north section, Ms. Green noted the wetlands south of Henry are the same for the various alternatives. They are located along IL 29 at Crow Creek and have an FQI of 21

Charles Perino asked if the west right of way line would remain as it is today along the Miller-Anderson Woods Nature Preserve. He wondered if the road could be moved west, thereby avoiding relocating the railroad. It was noted one of the current alternatives uses a compressed design with a barrier median and retaining walls to get the proposed improvement between Miller-Anderson Woods Nature Preserve and the railroad.

**Point of Concurrence:** In regards to the overall project and the alternates to carry through the public meetings, John Betker said he understood the elimination of the through-town alternates in Chillicothe and Henry. He felt the alternate that goes through Putnam should be kept until after comments are received from the public meetings. Mr. Betker also agreed with keeping two alternates in Sparland and the other alternates shown. Concurrence was received on the alternates to carry forward.

It was noted that there will be another alternates to carry forward meeting as the current alternates are refined and further developed.

April 28, 2003  
 NEPA/404 Merger Meeting Minutes  
IL Route 29 Study  
 Peoria, Marshall, Putnam and Bureau Counties  
 P-94-009-01

#### Concurrence Point: Purpose and Need & Alternatives to Carry Forward

A list of those in attendance is attached:

Mike Lewis (IDOT) introduced the project and CH2M HILL, the project's consultants.

Dan Dupies, of CH2M HILL, presented the agenda of items to be covered. Mr. Dupies explained that the proposed EIS format would combine the Affected Environment Section and Environmental Consequences Section into one section (Chapter 3). This is the only departure in the traditional EIS format that is contemplated.

Mr. Dupies then gave a short project overview. Following the project overview, he presented the project's Purpose and Need.

Newton Ellens (U.S. EPA) asked whether traffic characteristics on IL 29 today are representative of the characteristics of other highways on the National Highway System (NHS). Mr. Dupies explained that we do not have at hand study area statistics comparable to the national statistics to answer this question.

Heidi Woeber (US Fish & Wildlife Service) asked whether the project might be phased to defer four-lanes on some portions until warranted by demand for additional capacity. It was noted that while traffic volumes on the portion of IL 29 between Sparland and Henry would not reach IDOT's 4-lane threshold until after 2032, the volumes in the Henry would reach the threshold before 2032. In the interest of improving continuity and not creating a patchwork of highway, it was suggested that it would be more prudent to widen the Sparland-Henry segment even though it does not meet the 4-lane standard. Additionally Paula Green (IDOT) noted that highway studies must have logical termini. For this project the logical termini are IL 6 and I-180, each of which is a 4-lane facility. Even if the widening of certain portions IL 29 between these termini were constructed at a later date it is necessary to study the entire length at this time.

**Point of Concurrence:** J. D. Stevenson (FHWA) noted a separate meeting was held on April 25, to present the Purpose and Need to John Betker (US Army Corps of Engineers). Mr. Stevenson asked if Mr. Betker concurred with the Purpose and Need. Ms. Green said Mr. Betker had given his concurrence on April 25, 2003. Concurrence was received for the Purpose and Need statement as presented.

Dick Stafford (CH2M HILL) then presented the alternatives that were studied, indicating the reasons that some were dropped, along with the reasons others were retained and the expected impacts of the alternatives to be carried further. The discussion proceeded from the South Section to the Central Section to the North Section.

A question was raised as to whether the acreage of wetlands presented for the alternatives included both the INHS surveyed wetlands and the NWI wetlands as shown on the exhibits in the handout. The answer was that it does. In areas where surveys have been conducted by the Illinois Natural History Survey (INHS), only the INHS wetland delineations were used. However, surveys by INHS have not been completed for all of the alignments to be carried forward. In areas that haven't been surveyed by INHS the NWI wetland limits were used.

In response to a question about the typical section of the preliminary alternatives, Mr. Stafford answered that the right-of-way width used for this level of comparison was 300 feet wide, but narrower bands (approximately 150 feet wide) were assumed where there was a need to either avoid or minimize impacts to important environmental features or communities.

Newton Ellens (USEPA) asked whether going through Sparland and the other small communities would be similar to going through Chillicothe. Mr. Stafford answered that the residential and commercial impacts would be substantially less in Sparland because it is not as large or densely developed as Chillicothe. Also nearly all of the residential development is located west of IL 29. Relocating the railroad to the east, if possible, would substantially reduce displacements in Sparland. In Chillicothe, however, commercial and residential development are located both sides of the existing IL 29. Therefore, through Chillicothe significant impacts can't be avoided by shifting either east or west. Greg Larson (IDOT) also pointed out that Hopewell sits on the top of the bluff and is not bisected by IL 29.

Steve Hamer (IDNR) asked which IDNR properties/natural areas were being affected in the central section and the amount of impact by property. After some checking, Mr. Dupies noted that it would be best to review the GIS database results and send a breakdown of the impacts to Mr. Hamer. (A copy of the revised breakdown as related to IDNR land and Natural Areas is included with these minutes.)

Todd Bittner (IDNR) indicated his concerns with the alternatives proposed to be carried forward in the North Section. In the vicinity of Miller-Anderson Woods a breeding bald eagle's nest is located east of the railroad. All three alternatives would remove a natural visual barrier of trees between IL 29 and the eagle nest. Mr. Bittner passed out an aerial showing areas of importance in or near Miller-Anderson Nature Preserve. These included the boundaries of: the winter eagle roost areas, a seep/wet prairie complex, locations of *Boltonia decurrens*, Goose Lake Botanical Area (a new INAI site), and the expanded boundaries of Miller-Anderson Woods Natural Area limits which are associated with the *Boltonia decurrens* and an eagle nest. The natural area associated with the bald eagles nest encompasses the existing IL 29 and all of the alternatives go through this expanded new limit of Miller-Anderson Woods Natural Area. Mr. Bittner noted that it's not the acres of natural area affected by the highway improvement, but the disturbance to the eagles caused by the removal of the tree barrier and construction activity.

Mr. Hamer (IDNR) asked what the current status is for bald eagles. Heidi Woeber explained eagles are in the process of being de-listed, but the process may take awhile. It was noted that this project should continue under the premise that they are listed as threatened since that is the current status. This would change if the eagle's status changes in the future.

Charles Perino (IDOT) pointed out that the impact matrix tables should list the bald eagle as a potential impact for all of the proposed alternatives since construction activity and/or normal highway traffic of each one might cause the eagle to abandon its nest. Mr. Perino noted in the impact analysis section of the EIS, a determination would be made of how the reasonable alternatives would affect the bald eagle, and whether the impact would be contrary to the State or Federal eagle recovery plans. Mr. Perino also said he is planning to investigate the eagle population in the region and state to assess the impact of possibly losing this one nest. It was also noted that the eagle may not be harmed by the roadway improvement, but may just move to another location if disturbed.

Mr. Bittner said he didn't understand why any option on IL 29 is being considered since the improvement would run through the critical habitat for the bald eagle. J. D. Stevenson (FHWA) explained that although impacts to the critical habitat are important, they are not enough to stop considering these alternatives at this time. More investigation is necessary regarding the eagle habitat. Mr. Hamer advised that we proceed with caution.

Mr. Bittner noted changes have occurred in the last two months and several locations of *boltonia decurrens* have been located between the railroad and the river. He wondered what may be done to avoid this federally endangered plant. Heidi Woeber noted the *boltonia decurrens* respond well to disturbance and there are ways to move the plant and mitigate for the impact without jeopardizing the continued existence of the species.

Ms. Green asked if there is something that can be done to enhance the area and make it better habitat for bald eagles. Short of not building an improvement, there were few suggestions. Heidi Woeber said there are construction guidelines that are available to help reduce potential impacts to eagles.

Mr. Bittner is also concerned that there are natural areas within the IDOT right-of-way that are not accounted for in the impact summary. The two new areas, which expanded Miller-Anderson Woods Natural Area, were not factored in the impact tables. The tables will be revised to reflect the new boundaries. Dick Stafford also explained there was no intention to move the edge of roadway or shoulder farther west than it already exists in the vicinity of Miller-Anderson Woods. A field investigation to attempt to actually locate the boundaries of the natural areas in relationship to the roadway right of way has been scheduled for May 7, 2003. Hopefully this will eliminate questions regarding impacts to Natural Areas.

**Point of Concurrence:** Concurrence on the alternatives to carry forward was requested. Mr. Stevenson asked if John Betker had concurred on this point at the separate meeting held with IDOT on April 25<sup>th</sup>. Ms. Green said Mr. Betker had concurred. Concurrence was granted. Steve Hamer asked that along with this concurrence the eagle habitat and natural areas within IDOT's right of way near Miller-Anderson Woods Nature Preserve be looked at closely and due caution be taken.

-----Original Message-----

From: Stevenson, Jerry [mailto:Jerry.Stevenson@fhwa.dot.gov]

Sent: Tuesday, April 26, 2005 1:01 PM

To: ellens.newton@epa.gov; heidi\_woeber@fws.gov;

John.G.Betker@mvr02.usace.army.mil; westlake.kenneth@epa.gov;

Tsavko@agr.state.il.us; Shamer@dnrmail.state.il.us

Cc: Piland, Janis; Strang, Randy; Cowin, Jason; Green, Paula A; Lewis, Mike

Subject: IL-29 EIS - Bluff Alignment Technical Memorandum

Folks,

At the March 1, 2005 NEPA/404 Merger meeting in Schaumburg, we asked the consultant and IDOT District 4 to provide additional information and justification for dropping the Bluff Alignment from consideration. Subsequently, you will find the subject memo along with traffic maps for the Bluff Alignment attached to this e-mail. At this point we are asking you to review this additional information and we are seeking your concurrence in dropping the Bluff Alignment. We ask for your response by May 13, 2005. Your concurrence may be provided to me via e-mail if you feel comfortable in responding in this way. If not, please provide your preference (conference call, meeting, ...) in providing concurrence as soon as possible so that any needed preparations can be made. As Always, if you have any questions or need any additional information, please contact me.

Thanks for your help!!

J.D. Stevenson  
Environmental Programs Engineer  
Illinois Division  
Federal Highway Administration  
3250 Executive Park Drive  
Springfield, IL 62703  
Phone - (217) 492-4638  
Fax - (217) 492-4238  
jerry.stevenson@fhwa.dot.gov

<<03-10-05 bluff alt TECHNICAL MEMORANDUM.doc>>  
<<exhibit\_Cen\_Bulff\_traffic.pdf>> <<exhibit\_Cen\_Exist\_traffic.pdf>>



MEMORANDUM

Illinois Route 29 Study  
Analysis of the Bluff Section Alignment

Introduction

The purpose of this memorandum is to discuss the Bluff Alignment (Alternative C-2 in the Central Section of the IL 29 Study) and whether it should continue to be included in the project's reasonable range of alternatives to be carried forward.

In the Central Section, the bluff alignment concept was introduced to the study because there were concerns that significant adverse impacts to Section 4(f) property, Natural Areas, IDNR lands, wetlands and woodlands may occur if existing IL 29 were to be widened. During the project's alignment development phase, several alignments were evaluated on the bluff west of Sparland. In the end one alignment, the Alternative C-2, was identified as the representative "bluff alignment".

To date, the project team has avoided applying the "reasonableness" test to the Bluff Alignment that it has to other alternatives. Having completed the study's second public information meeting and developed the Bluff Alignment and the project's other remaining alternatives to a 90 percent design level, the project team has sufficient information to evaluate whether the Bluff Alignment would meet the project's purpose and need and whether it is a prudent alternative that should be included in the reasonable range of alternatives.

Purpose and Need

The purpose of the proposed action is to enhance transportation continuity between the freeway connections at IL 6 and I-180 by improving IL 29 to be a safe and efficient highway that will serve existing and future travel demand while minimizing disturbance to the natural and built environment. The proposed highway facility will improve transportation continuity, facilitate modal interrelationships, improve travel efficiency and enhance economic stability.

As part of the study, the project team evaluated the amount of traffic that would be carried by either an improvement on IL 29 or by the Bluff Alignment in the design year 2032. The analysis found that between 8,600 and 15,600 vehicles per day would use a widened facility along existing IL 29 in the Central Section. The Bluff Alignment was predicted to carry between 2,850 and 3,800 vehicles daily and would leave 5,700 to 11,900 vehicles per day on the existing 2-lane IL 29. In addition, under a No Build scenario, it is anticipated that in 2032 approximately 12,200 vehicles per day would utilize the existing IL 29 roadway south of IL 29. Under either a No Build or Bluff Alignment alternatives consideration of a 4-lane improvement on IL 29, south of IL 17, would be warranted before 2011. Please refer to the enclosed traffic maps and Table 1.

Table 1 - 2032 Average Daily Traffic Volumes

| Roadway                        | Average Daily Traffic<br>South of IL 17 | Average Daily Traffic<br>North of IL 17 |
|--------------------------------|---|---|
| No Build                       | 12,200                                  | 7,400                                   |
| Bluff Alignment                | 3,500                                   | 2,850                                   |
| IL 29 - 2 lane                 |   |   |
| With the Bluff Alignment       | 11,900                                  | 5,700                                   |
| IL 29 - 4 lane                 |   |   |
| Without the Bluff<br>Alignment | 15,600                                  | 8,600                                   |

Marshall County residents living east of the Illinois River utilize the IL 17 River Bridge to access the west side of the river. For residents west of the Illinois River, IL 17 provides access to Marshall County and a direct connection to I-39 or I-55. Alternate river crossings are located either 7 miles north on IL 18 or 24 miles south on US 24/US 150. The traffic projections in Table 1 and on the traffic maps are based on an approximate 70/30 per cent split in traffic. The split takes into account that 70% of the travelers would be frequent users (also referred to as local traffic) and 30% would be through travelers.

To better understand the rationale of traffic estimates with the Bluff Alignment in place, the various traffic movements may be viewed separately. In the following discussion, all traffic volumes are expressed as average daily traffic (ADT) in the design year 2032.

- Through traffic between the North Section and the South Section (approximately 2000 ADT): It is assumed that all of this traffic would utilize the Bluff Alignment.
- Traffic between the East via Lacon and the South Section (approximately 8,000 ADT): This is the largest single segment of traffic demand. From the IL 29/IL 17 intersection in Sparland to the north side of Chillicothe, travel time would be about two minutes longer via the Bluff Alignment than on existing IL 29. It is predicted that most drivers (about 7000 ADT) would elect to use the existing route. This single traffic flow would account for nearly two-thirds of the projected volume on existing IL 29 between Sparland and Chillicothe.
- Traffic between the East via Lacon and the North Section (approximately 3500 ADT): It is assumed that all of this traffic would utilize existing IL 29.
- Through traffic on IL 17 between the East via Lacon and the West (approximately 3000 ADT): This traffic would utilize neither the Bluff Alignment nor existing IL 29.
- Traffic between the West on IL 17 and the North and South Sections (less than 1000 ADT): It is assumed that all of this traffic would utilize the Bluff Alignment.
- Local Sparland, Hopewell, Chillicothe, etc. (approximately 2000 ADT to 3000 ADT depending on location): It is assumed that all of this traffic would utilize IL 29.

A-19

- Local traffic on the Bluff Alignment (less than 1000 ADT): Since the area abutting the Bluff Alignment is primarily farmland it is anticipated that this would be a low traffic generation.

Based on an aggregation of these individual traffic forecasts it has been estimated that the 2032 traffic volume with the On IL 29 alignment between Chillicothe and Sparland would be approximately three times greater than the projected volume on the Bluff Alignment. Also, North of Sparland, the On IL 29 alignment would carry approximately twice the traffic estimated for the Bluff Alignment. Please refer to Figures 1 and 2.

If the Bluff Alignment were constructed, the route of choice for the majority of travelers would still be the existing IL 29. Motorists are only likely to alter their routs if they perceive the route is more efficient. The Bluff Alignment requires motorist go through additional stop controlled intersections, traffic signals and through residential areas. This coupled with additional adverse travel makes diversion less likely. Frequent or recurring travelers from east of the Illinois River working, visiting or doing business in Sparland, Chillicothe or Peoria will use the route that is most reasonable to them. This would be either the existing IL 29 or a widened IL 29.

The failure of the Bluff Alignment to attract travelers and alleviate future congestion on existing IL 29 means that it would not fulfill the purpose statement of providing a safe and efficient highway that would serve existing and future travel demands.

## Impacts

As stated at the beginning of this Technical Memorandum, the bluff alignment concept was introduced to the study because there were concerns about adverse impacts to Section 4(f) property, Natural Areas, IDNR lands, wetlands and woodlands may occur if existing IL 29 were to be widened. Due to this concern, engineering studies have emphasized the need to minimize impacts of the On IL 29 alignment. The use of atypical design features such as utilizing a 22 ft. barrier median as opposed to the usual 50 ft. open median, utilizing a split profile design through constricted or sensitive areas, and the utilization of retaining walls to avoid extensive disturbance along the bluff side of IL 29 have, to a great extent, reduced adverse affects of this alternative. Refer to Table 2 for a listing of impacts and Table 3 for a comparison of impacts between alternatives.

### Alignment Impacts

Section 4(f) impact of the On IL 29 alternative is limited to the removal of a potentially historic bridge located on an access road adjacent to the existing IL 29 roadway. Localized avoidance options, such as moving the roadway to the east, are being investigated at this site. No Section 4(f) impacts would be associated with the Bluff Alignment.

Design measures have reduced the impact on Natural Areas to 0.4 acres at the Hopewell Hill Prairie and 0.7 acre at the Marshall County Hill Prairie. Impacts at both of these locations are restricted to areas located within the existing right-of-way which are buffer areas adjacent to

the existing facility. No impacts are anticipated in the vicinity of the protected hill prairies. No impacts to Natural Areas would be anticipated with the Bluff Alignment.

South of Sparland, design measures have reduced the impact to IDNR lands to 0.12 acre. The Sparland interchange would impact another 7.8 acres of IDNR property. No impacts to IDNR lands would be anticipated with the Bluff Alignment.

**Table 2**  
**Central Section from Benedict Rd. to 1 ½ mile north of Camp Grove Rd.**

| Factor                                | On IL 29   | Bluff Alignment |
|---------------------------------------|------------|-----------------|
| Existing Right-of-Way Used (ac)       | 211        | 77              |
| New Right-of-Way Needed (ac)          | 249        | 638             |
| <b>Total Right-of-Way Needed (ac)</b> | <b>470</b> | <b>715</b>      |
| Landlocked (ac)                       | 698        | 0               |
| Cost (\$ Millions)                    | 220 - 230  | 180 - 190       |
| Farmland Impacts (ac)                 | 218        | 626             |
| Residential Displacements             | 26         | 11              |
| Commercial Displacements              | 1 - 2      | 1               |
| Wetland Impacts (ac)                  | 20         | 13              |
| Forested Areas (ac)                   | 70         | 112             |
| Natural Area Impacts (ac)             | 1.1        | 0               |
| IDNR Land Impacts                     | 8          | 0               |
| Floodplain Impacts (ac)               |            |                 |
| Illinois River                        | 61         | 0.2             |
| Senachwine Creek, South               | 27         | 21              |
| Crow Creek                            | 15         | 17              |
| Other                                 | 18         | 0               |

Comparison Table 3  
Central Section from Benedict Rd. to 1 ½ mile north of Camp Grove Rd.

| Factor                          | On IL 29 | Bluff Alignment |
|---------------------------------|----------|-----------------|
| Existing Right-of-Way Used (ac) | +134     |                 |
| New Right-of-Way Needed (ac)    |          | +389            |
| Total Right-of-Way Needed (ac)  |          | +245            |
| Landlocked (ac)                 | +698     |                 |
| Cost (\$ Millions)              | +40      |                 |
| Farmland Impacts (ac)           |          | +408            |
| Residential Displacements       | +15      |                 |
| Commercial Displacements        | 0        | 0               |
| Wetland Impacts (ac)            | +6       |                 |
| Forested Areas (ac)             |          | +42             |
| Natural Area Impacts (ac)       | +1.1     |                 |
| IDNR Land Impacts               | +8       | 0               |
| Floodplain Impacts (ac)         |          |                 |
| Illinois River                  | +61      |                 |
| Senachwine Creek, South         | +6       |                 |
| Crow Creek                      |          | +2              |

No wetland impacts are anticipated south of Sparland with either alternative. The Sparland interchange proposed with the On IL 29 alignment would impact 7.9 acres of wetland with an FQI of 17 or less. The On IL 29 alignment and the Bluff Alignment would impact 8.2 acres and 9.4 acres of wetlands, respectively in the vicinity of Crow Creek. Each alternative would impact 3.8 acres of wetland with a FQI of 21 within the Crow Creek wetland complex.

The On IL 29 alignment would impact 70 acres of woodland while the Bluff Alignment would impact 112 acres. The majority of woodland impacts resulting from the On IL 29 alignment are associated with fringe areas adjacent to the existing facility; however, impacts to forested areas by the Bluff Alignment would result in fragmentation of large tracks of woodlands.

In regards to right-of-way needed to construct each alternative; 470 acres, of which 211 acres are existing right-of-way, would be needed for the On IL 29 alignment and 715 acres, of which 77 are existing right-of-way, would be needed for the Bluff Alignment.

Approximately 218 acres and 626 acres of farmland would be impacted by the On IL 29 and Bluff Alignment respectively. Of the farmland required for the Bluff Alignment approximately 95.2 acres are zoned as Protected Agricultural Land.

Other notable impact differences between the two alternates are: The On IL 29 alignment would result in 15 additional residential displacements than the Bluff Alignment. Also the On IL 29 alignment would impact 61 acres of Illinois River floodplain

#### Landlocked Parcels

With the On IL 29 alignment approximately 698 acres of property would be landlocked. Approximately 607 acres of landlocked parcels are located south of Sparland and east of IL 29. These landlocked areas involve 6 parcels belonging to 4 separate landowners. Reasonable access can not be provided to these properties due to conflicts with the railroad. There are no landlocked parcels associated with the Bluff Alignment.

Within the Sparland interchange area another 87 acres of land would be landlocked. Access can not be provided to these properties due to conflicts with ramps and access control limits associated with the interchange.

Vegetative cover types associated with the landlocked parcels are:

Cropland - 52.9 acres

Forested Wetland - 326.6 acres

Upland Forest - 45.7 acres

Water - 269.4 acres

The remaining landlocked parcels are located along IL 17 in Sparland and in the vicinity of Barville Creek.

#### Adverse Impacts

Adverse impacts resulting from the landlocked parcels include the removal of approximately 53 acres of cropland and the removal of land from the tax base.

Based on 2003 tax records the tax loss would include:

Marshall County - \$351.85

Steuben Township - \$155.33

Midland Community School District - \$1,570.81

Village of Sparland - \$149.12

#### Beneficial Impacts

Beneficial Impacts associated with the landlocked parcels in the Central Section include:

- o 326.6 acres of forested wetlands would be protected,
- o 45.7 acres of upland forest would be protected,

- o 42 acres of cropland could be converted to wetland, thereby providing on site mitigation for wetland impacts ( the remaining cropland could not be converted because it contains an American Indian village archaeological site),
- o increased safety by reducing the number of railroad crossings,
- o increased safety by reducing the number of entrances onto IL 29, and
- o protection of the Federally Threatened Decurrent False Aster (*Boltonia decurrens*).

## Conclusion

Early in the IL 29 Study, the project team recognized the need to develop/evaluate an alternative that would avoid the potential impacts associated with widening existing IL 29. From the time the Bluff Alignment was developed there has been a question about whether it was a feasible and prudent alternative or if it should be eliminated from consideration.

The major reason to eliminate the Bluff Alignment from further consideration is that it doesn't meet the project's purpose and need to enhance transportation continuity between the freeway connections at IL 6 and I-180 by improving IL 29 to be a safe and efficient highway that will serve existing and future travel demand while minimizing disturbance to the natural and built environment.

The traffic analysis projected to 2032 found that between 2,850 and 3,800 vehicles per day would use the Bluff Alignment. If IL 29 were to be widened the analysis found that between 8,600 and 15,600 vehicles per day would utilize the facility. This indicates the location of the existing facility better addresses the needs of the traveling public in the region.

If the Bluff Alignment were constructed the route of choice for the majority of travelers would still be existing IL 29. The failure of the Bluff Alignment to attract travelers and alleviate future congestion on existing IL 29 means that it would not fulfill the purpose statement of providing a safe and efficient highway that would serve existing and future travel demands.

Also, when comparing the alternatives it is obviously less prudent to spend money on the Bluff Alignment which would serve 2,850 to 3,800 vehicles daily than to spend money on the On IL 29 alignment which would serve 3 to 4 times as many vehicles

The Central Section design work and traffic forecasting completed over the past several months have clarified the impacts of the Bluff Alignment and the nature of impacts along existing IL 29. The many design refinements along the existing IL 29 alignment have made great strides in eliminating or minimizing impacts. As can be seen from the preceding tables and discussion, the impacts anticipated to result from an On IL 29 alignment have not developed. The Bluff Alignment, therefore, does not offer a significant reduction of impacts when compared to the On IL 29 alternative.

## Recommendation

Based on the facts presented in this memorandum it is recommended that for the Central Section of the IL 29 Study the only alternatives to be carried forward should be the No Build Alternative and the On IL 29 Alternative.

It is also recommended the EIS contain a discussion of the Bluff Alignment and reasons it was eliminated from further consideration in the Alternatives Section of the document.

## Action

Concurrence on the recommended alternatives to carry forward is requested.

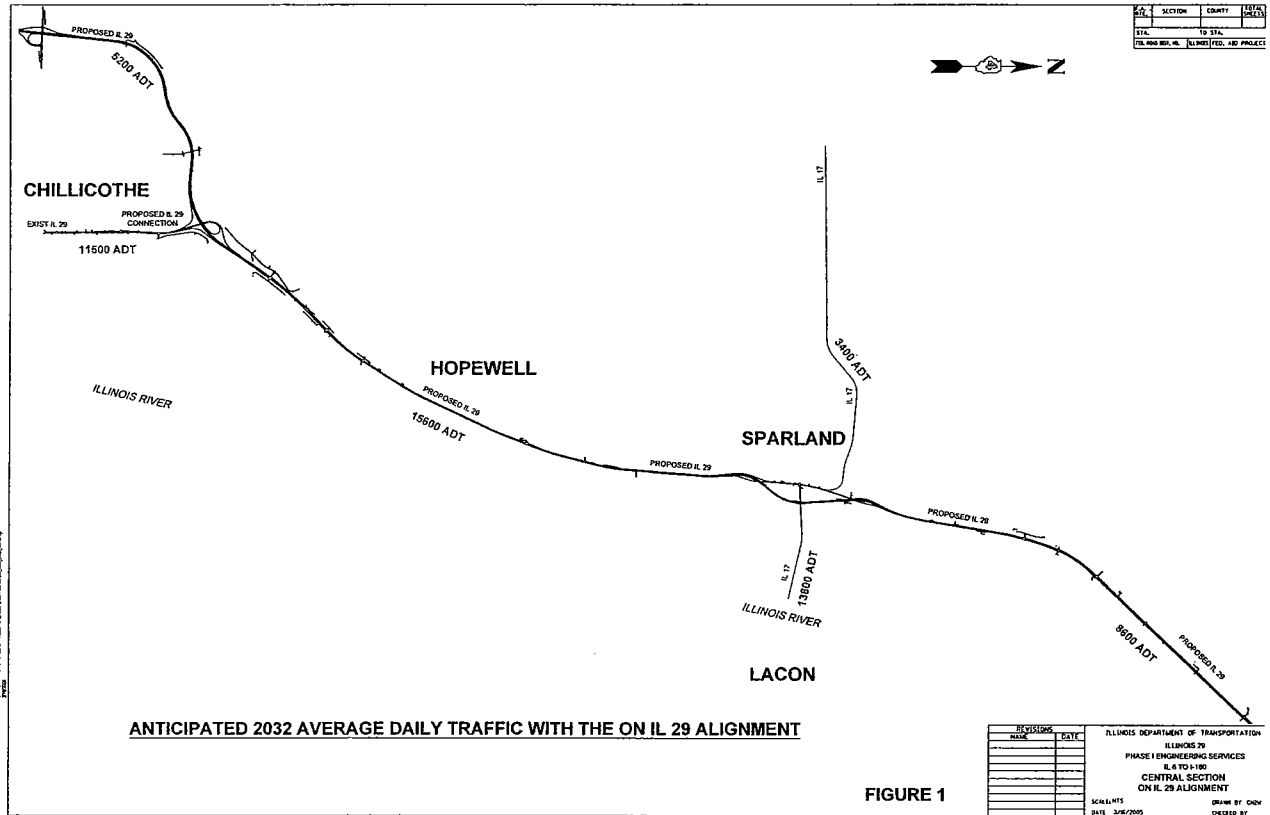


FIGURE 1

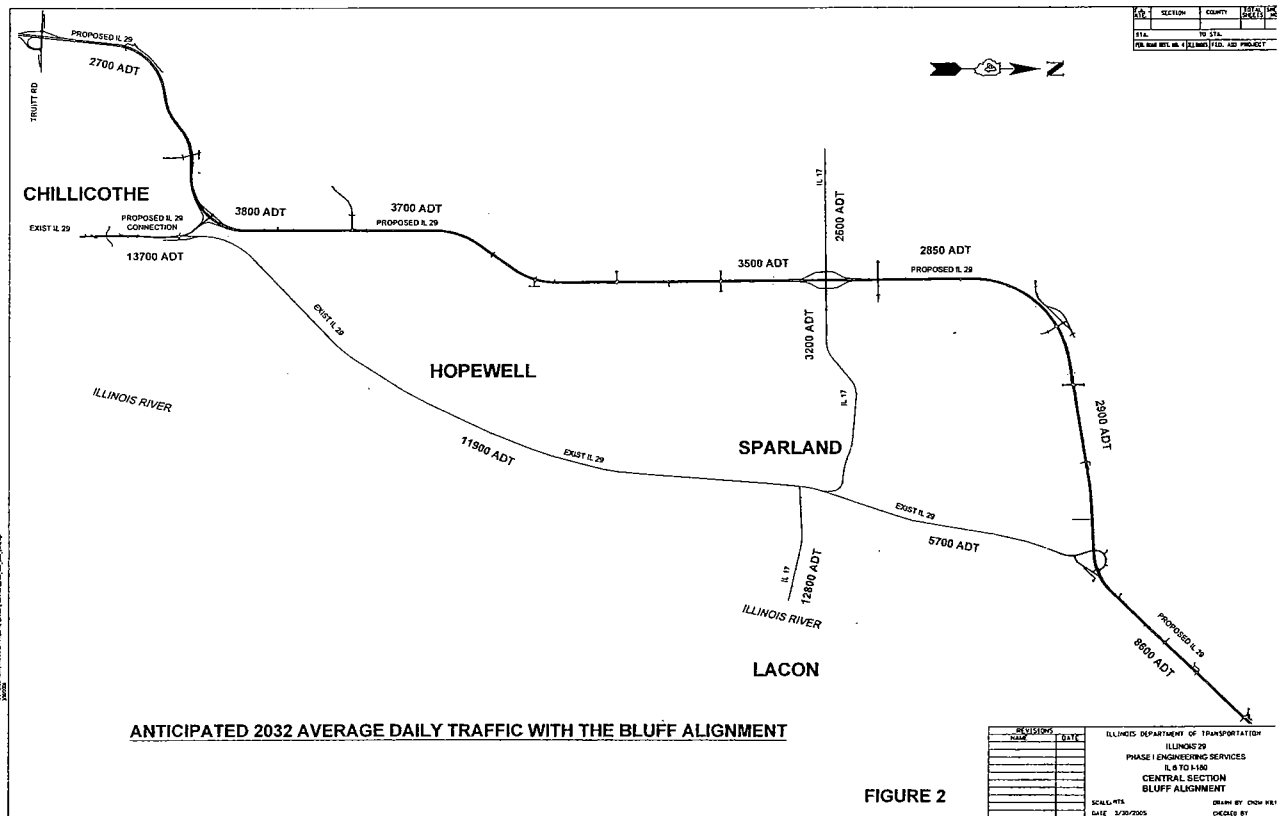


FIGURE 2

## MEETING SUMMARY

CH2MHILL

## IL 29 Corridor Study Second NEPA/404 Coordination Meeting

ATTENDEES: See Sign-in Sheet  
FROM: CH2M HILL  
DATE: March 29, 2005

### Introduction

Dan Dupies (CH2M Hill) opened the meeting by reviewing the meeting purpose and project agenda. The purpose of the meeting was to provide an update on the project alternatives since the June 2004 Technical Advisory Committee meeting and to obtain agency concurrence on the range of alternatives to be evaluated in detail in the project's Draft EIS.

### South Section Update

Dan and Kim Kolody (CH2M HILL) then began the alternatives update starting in the South Section. Kim stated that IL 29 is proposed to be a freeway from the IL 6 interchange to the proposed north Chillicothe interchange. Access would be provided at the following interchanges, IL 6, Cedar Hills Drive, Rome West Road, McGrath Street and Truitt Avenue. Dan noted that impacts in the South Section were primarily to agricultural land (580 acres), and that the state-protected viburnum molle would be affected north of the BNSF railroad. The impact was unavoidable because of other constraints in the Truitt Avenue interchange area.

### Central Section Update

#### On IL 29 Alignment

In the Central Section, Kim noted that there were no changes to the typical section between the Benedict Road bridge and the proposed north Chillicothe interchange. A trumpet interchange had been selected because it was the most efficient at accommodating traffic traveling between Chillicothe and Sparland. Kim pointed out that while there were no changes to the alignment from north of Chillicothe to south of Sparland, the typical section changed. Rather than keeping the northbound and southbound lanes at the same elevation, a split profile is recommended. The split profile, which would have the southbound lanes at a different elevation than the northbound lanes, was recommended because it minimized the cut required into the west bluff and impacts on natural areas and IDNR properties. Heidi Woeber (U.S. FWS) asked whether the split profile compromises safety. Kim responded that because the split profile maintains two lanes in each direction separated by a barrier median, this typical section does not pose a safety issue.

In Sparland, Kim stated that the interchange options had been narrowed to two alternatives 3 and 3a. While the right of way requirements for each were very similar, alternative 3a was selected because it avoided the flood buyout properties in Sparland. FHWA and FEMA

recommended avoiding the flood buyout properties rather than entering a lengthy (and probably unsuccessful) coordination process to be able to place fill on those properties.

Kim noted that a number of properties would be landlocked in the Central Section. Some of the "landlocking" was caused by the proximity of the properties to the proposed Sparland interchange. The majority of the landlocked acreage was the result of the decision to obtain a number of properties east of the Lincoln & Southern Railroad rather than provide access. The approximate cost of providing access generally was as much or more than the estimated cost to purchase the property. North of Sparland to the Crow Creek area there were no changes to the alignment, but a split-profile section was added from north of Thenius Drive to south of Camp Grove Road. Also, IDOT decided to use a guardrail with 2:1 sideslopes on the west side of IL 29 adjacent to Crow Creek to minimize impacts to floodplain and wetlands. Although the guardrail option does not reduce floodplain and wetland impacts to same extent as the retaining wall option, the guardrail option would be \$10 million less to construct.

### Bluff Alignment

Dan opened the discussion of the Bluff Alignment by informing the group that the issue was whether the Bluff Alignment should be evaluated in detail in the Draft EIS. Dan began the discussion by reviewing the Bluff Alignment-On IL 29 Alignment impact comparison. He noted the Bluff Alignment's primary impact was to agricultural land. While the total right of way needed to construct the On IL 29 Alignment was less than needed for the Bluff Alignment, the On IL 29 Alignment landlocked much more property. The On IL 29 Alignment had more floodplain and wetland impacts, but the Bluff Alignment had more forest impacts.

Following the impact summary review, Dan described the results of the traffic study, which showed that the Bluff Alignment would have 2,700 to 3,800 average daily traffic (ADT) in 2032, leaving 5,700 to 12,600 ADT on existing IL 29. Because the Bluff Alignment would attract so little traffic, it would not increase travel efficiency in the project area and, therefore, does not meet the project's purpose and need.

John Betker (U.S. COE) asked why traffic would not use the Bluff Alignment. Dan responded that there is a traffic break in the project area at IL 17 in Sparland with a substantial traffic volume crossing the river (eastbound and westbound). Because a large number of the trips are traveling between Lacon and Chillicothe (and points south), it would be inefficient to use the Bluff for that type of trip. John asked whether there are any portions of the Bluff Alignment (subalternates) that would satisfy purpose and need. Dan and Eric Therkildsen said no. John asked if there were any other convenient way to get to Lacon from Peoria. Eric replied that there was not a convenient way. John asked whether the Bluff Alignment would be more attractive to southbound traffic if IL 17 were improved to eliminate the "jog" in Sparland where IL 17 is concurrent with IL 29. It was pointed out that this alternative had been considered but eliminated because of the impacts to floodplain and IDNR's property in Sparland.

Newton Ellens (U.S. EPA) asked Steve Hamer (IDNR) whether the 8 acres affected by the On IL 29 alignment was significant. Steve said yes taking particular note of the severed

property in Sparland. He noted, however, that IDNR would request mitigation for the potential impact.

John said that he was not convinced that the Bluff Alignment should be dropped at this time. J.D. Stevenson (FHWA) noted that the project team would need a full explanation in the Draft EIS why the Bluff Alignment should be eliminated from further consideration. Newton asked whether the project's purpose and need is addressing long- or short-distance trips. Dan responded that the purpose and need addresses all trips between IL 6 and I-180. Ken Westlake (U.S. EPA) and John stated that our decision to drop the Bluff Alignment seems to be predicated on traffic moving east and west of the river between the Lacon area and Chillicothe (and points south). Eric noted that not all IL 29 traffic is bound for IL 17 so IDOT is not immediately concerned about the IL 17 bridge being able to accommodate future traffic volumes. Because it is a two-lane bridge, it is possible that it would have to be expanded if traffic volumes increase to a level where IDOT considers two-lane to four-lane expansion.

Newton asked whether the Bluff is part of the Peoria Wilds. Paula Green (IDOT) indicated that part of the Bluff was in the Peoria Wilds, including the portion where the greatest impact to forested land is located.

When the agencies were asked whether they could agree today to drop the Bluff Alignment, they indicated that they needed more traffic information before they might drop it. Paul Niedernhofer (IDOT) suggested that it should be shown when existing IL 29 would have to be expanded if the Bluff Alignment were constructed. Heidi Woeber asked DNR's opinion about the Bluff Alignment. Steve responded that the DNR still supports the Bluff Alignment but could agree to improving existing IL 29 with the appropriate mitigation. J.D. said that the project team should provide FHWA with the additional detail requested before it is sent to the agencies. After the agencies review the additional information, it will be decided how to proceed and whether another meeting is needed or whether it can be handled through e-mail.

### North Section Update

Kim stated that there were no changes to the alignment or the typical section in the North Section. A 0.1 acre seep north of Brewmaster's Restaurant would be filled by the proposed improvements. An eagle's nest was located west of IL 29 at the south edge of the Miller-Anderson Woods Nature Preserve. A groundwater study conducted by ISGS in Miller-Anderson Woods during summer 2004 concluded that the proposed project would not adversely affect groundwater. In reviewing the North Section impacts, Paula pointed out that most of the 7.6-acre impact to the Miller-Anderson Woods Natural Area (east of IL 29) was within IL 29 and railroad right of way.

### Other Issues

Kim pointed out that wildlife crossings are planned throughout the project. Currently, the project team is proposing to widen 12 bridges to accommodate large mammals, construct 9 culverts to accommodate large mammals and construct 8 culverts to accommodate small animals.

Coordination will continue with the railroads to work through the safety issues at railroad crossings.

INHS will be forwarding to the project team some information from their 2004 field studies. The archaeology work continues but it has been determined that the project will not affect any burial mounds. Some village sites will be affected. A Memorandum of Agreement will be developed to cover those impacts. More work will be done on the village sites during the Phase II work.

Coordination with IDNR will continue on the appropriate level of mitigation.

Barb Traeger (IDOT) noted that the Detailed Action Report is in progress.

Paula indicated that the next meeting with the Technical Advisory Committee would likely be this summer/fall prior to the public hearing.

Dan reviewed the Draft EIS target dates and the planned date of the public hearing.

J.D. Stevenson said the third concurrence point meeting for the preferred alternative would likely occur between the public hearing and the signing of the Final EIS.

### Actions taken subsequent to the March 29, 2005 NEPA/404 meeting

On April 26, 2005, J.D. Stevenson provided additional information requested at the March 1, 2005 NEPA/404 Merger meeting in Schaumburg regarding dropping the Bluff Alignment from further consideration. The Agencies were asked to respond by e-mail with their concurrence in taking this action. The IDNR provided FHWA with their concurrence via e-mail on April 28, 2005. In addition, the USEPA provided written concurrence to FHWA in their letter dated May 10, 2005.

During a May 16 phone conversation, John Betker indicated that both the USACE and the USFWS had concerns with dropping the Bluff Alignment from further study based solely on the fact that it did not meet the Purpose and Need. John indicated that the USACE and the USFWS could not concur in dropping the Bluff alignment based only on the fact that it did not meet the originally concurred in Purpose and Need. It read, "The purpose of the proposed action is to enhance transportation continuity between the freeway connections at IL 6 and I-180 by improving IL 29 to be a safe and efficient highway that will serve existing and future travel demand while minimizing disturbance to the natural and built environment." This statement appears to focus primarily on improving travel safety and efficiency between IL 6 to I-180, i.e. only serving regional travel needs. With this focus, it would be hard to justify that the Bluff Alignment does not meet Purpose and Need.

It was never the intent of IDOT, nor the understanding of FHWA, that the Purpose and Need would focus on regional travel only. This is evident in reading the paragraph under the Proposed Action section of the Purpose and Need Chapter where it states that travel safety and efficiency will be improved "in the IL 29 corridor", including both regional and local travel. Also, the second sentence in the

original "Purpose and Need" paragraph explains the intent to "improve transportation continuity, facilitate modal interrelationships, improve travel efficiency and enhance economic stability." However, IDOT and FHWA believed that the intent could be easily clarified in the Purpose and Need statement with the following: "The purpose of the proposed action is to improve transportation continuity, facilitate modal interrelationships, improve travel efficiency and enhance economic stability within the Illinois Route 29 (IL 29) corridor from Illinois 6 (IL 6) in Peoria County to Interstate 180 (I 180) in Bureau County. The proposed highway facility will provide a safe and efficient highway that will serve existing and future travel demand for both regional and local travelers while minimizing disturbance to the natural and built environment." FHWA does not believe that this clarification in the Purpose and Need requires revisiting the Purpose and Need concurrence point with the Resource Agencies.

Subsequent to issuing this clarification in the Purpose and Need, FHWA received e-mail concurrence from both the USACE and USFWS on May 25, 2005. In addition, FHWA received e-mail concurrence from the IDOA on June 1, 2005. Based on receiving concurrence from all Resource Agencies, the Bluff Alignment will be dropped from further consideration.



-----Original Message-----

From: Piland, Janis [mailto:Janis.Piland@fhwa.dot.gov]

Sent: Tuesday, May 31, 2005 4:02 PM

To: ellens.newton@epa.gov; heidi\_woeber@fws.gov; John.G.Betker@mvr02.usace.army.mil;  
westlake.kenneth@epa.gov; Tsavko@agr.state.il.us; Shamer@dnrmail.state.il.us

Cc: Green, Paula A; Stevens, Barbara H; Strang, Randy; Cowin, Jason; Lewis, Mike; Stevenson, Jerry  
Subject: IL 29 Purpose and Need and dropping Bluff Alignment

Folks,

Attached you will find a copy of the IL-29 Purpose and Need Chapter of the EIS. This is a copy of the original P&N that was concurred in by all the Resource Agencies. However, you will notice that the paragraph under the subtitle "Purpose and Need" reflects clarifications that have been implemented in response to concerns expressed by the Rock Island COE and FWS offices. Their concern was with dropping the Bluff Alignment from further study based solely on the fact that it did not meet P&N the way it was originally written, and as shown in the "Analysis of the Bluff Section Alignment" memorandum. It read, "The purpose of the proposed action is to enhance transportation continuity between the freeway connections at IL 6 and I-180 by improving IL 29 to be a safe and efficient highway that will serve existing and future travel demand while minimizing disturbance to the natural and built environment." This statement appears to focus primarily on improving travel safety and efficiency between IL 6 to I-180, i.e. on serving regional travel needs. With this focus, it would be hard to justify that the Bluff Alignment does not meet P&N.

It was never the intent of IDOT, nor the understanding of FHWA, that the P&N would focus on regional travel only. This is evident in reading the paragraph under the Proposed Action section of the P&N Chapter where it states that travel safety and efficiency will be improved "in the IL 29 corridor", including both regional and local travel. Also, the second sentence in the original "Purpose and Need" paragraph explains the intent to "improve transportation continuity, facilitate modal interrelationships, improve travel efficiency and enhance economic stability." However, we felt that the intent could be easily clarified in the P&N statement and have provided the attached. We do not feel that we have changed the P&N, only clarified it, and thus we do not need to revisit the P&N concurrence point with the Resource Agencies.

With this clarification, the Rock Island COE and FWS concur with dropping the Bluff Alignment from further study, provided there is full documentation explaining the reasons behind this decision. We now have

concurrence from all the Resource Agencies. IDOT will proceed with the preparation of the DEIS and fully justify dropping the Bluff Alignment in the Alternatives chapter (Chapter 3).

Jan

<<IL 29 P&N May 05 clarification.doc>>

Janis P. Piland

Environmental Engineer

FHWA Illinois Division

Springfield, IL 62703

Phone: (217)492-4989

Fax: (217)492-4621

Buckle up - Every Trip - Every Time

